

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

April 17, 2023


**Via ECF**

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**REQUEST GRANTED.**

The Court approves the temporary return of the passport as proposed and directs Pretrial Services to return to defense counsel Ana Beatriz Borges's Brazilian passport.

4/18/2023 SO ORDERED.



LEWIS J. LIMAN  
United States District Judge

**Re: United States v. Raquel Moura Borges**  
**21 Cr. 172 (LJL)**

Dear Judge Liman,

We write with the consent of the government to respectfully request that the Court order the temporary return of the passport for Ms. Borges's younger daughter. As part of Ms. Borges's bail package, the defense surrendered to Pretrial Services the passports of her two daughters. In order to obtain an identity card in New York State, Ms. Borges's younger daughter needs to show the Department of Motor Vehicles her original passport at an appointment scheduled for April 19, 2023.

So that she may obtain this identity card (which is not an international travel document), we respectfully request that the Court order Pretrial Services to return to defense counsel Ana Beatriz Borges's Brazilian passport, which the defense will surrender to Pretrial Services immediately after the younger Ms. Borges's appointment at the D.M.V. The Court previously granted a similar request for Ms. Borges's older daughter so that she could obtain an identity document. *See* Doc. 36. We are making this request of the Court after Ms. Borges's older daughter completed her D.M.V. appointment and returned her passport to Pretrial Services.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Neil P. Kelly  
Assistant Federal Defender  
(212) 417-8744

cc: AUSA Andrew Thomas